

BEFORE THE HEARING BOARD
OF THE
ILLINOIS ATTORNEY REGISTRATION
AND
DISCIPLINARY COMMISSION

In the Matter of:

CHRISTINE BUSANELLI,

Attorney-Respondent,

No. 6343112.

Commission No. 2026PR00031

COMPLAINT

Lea S. Gutierrez, Administrator of the Attorney Registration and Disciplinary Commission, by her attorney, Rachel C. Miller, pursuant to Supreme Court Rule 753(b), complains of Respondent, Christine Busanelli, who was licensed to practice law in the State of Illinois on November 17, 2022, and alleges that Respondent has engaged in the following conduct that subjects her to discipline pursuant to Supreme Court Rule 770:

COUNT I

(Using Means That Have No Substantial Purpose Other Than to Embarrass, Delay or Burden Another Person and Threatening to Present Criminal and Professional Disciplinary Charges to Gain an Advantage in a Civil Matter)

1. On or around June 28, 2025, Respondent visited a Jewel-Osco grocery store in Plainfield. During her visit, Respondent attempted to claim a reduced price on items she was planning to purchase. Respondent was told that the reduced price was only available to shoppers who used the Jewel-Osco application on their phones, which Respondent did not have. Respondent then requested disability accommodations based on vision issues. Jewel-Osco declined to provide the discount to Respondent.

2. Prior to July 10, 2025, Respondent asserted a disability claim against Jewel-Osco by submitting a complaint to the company. The basis of Respondent's claim was that she did not

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receive the store discount. On July 10, 2025, Jewel-Osco retained an Illinois-licensed attorney with the initials “S.F.” to represent it in relation to Respondent’s claim and investigate the claim, which included investigating the factual basis for the claim asserted by Respondent.

3. On July 10, 2025, S.F. sent an email to Respondent in which she stated that Jewel-Osco had retained S.F. to investigate Respondent’s claim. S.F. requested that she and Respondent speak on the telephone to discuss Respondent’s claim. Respondent, by way of reply email, told S.F. that she was available to talk the following day at 8:00 a.m. Respondent and S.F. spoke the following day at 8:00 a.m.

4. On July 17, 2025, at 8:17 a.m., S.F. sent an email to Respondent in which she stated that she needed to complete her investigation and report her findings to Jewel-Osco, but that she would “anticipate getting back to [Respondent] within the next 14 days at the latest,” although she anticipated it would be sooner. At 8:29 a.m., Respondent sent an email to S.F. and responded, “In the interest of transparency – local, state and federal charges will be filed, law enforcement will be notified, and a civil filing will be considered, starting today.”

5. On July 23, 2025, at 10:01 a.m., S.F. sent an email to Respondent and conveyed a settlement offer of a \$200 store gift card from Jewel-Osco. At 10:06 a.m., Respondent replied:

“Thanks for letting me know. I have held off on taking other action as a courtesy.

But now, the illegal and age discriminatory behavior will be reported to all necessary parties and agencies at the state and federal levels, law enforcement, and the media, of course.

Please place all security and surveillance footage on hold for possible subpoena action.

Please inform your client of all the above.

Christine, MBA, JD
Attorney-at-Law”

6. As of July 28, 2025, Respondent's claims relating to the June 28, 2025, incident remained pending. On July 28, 2025, at 8:29 a.m., Respondent sent an email to S.F. in which she stated that Jewel-Osco had discriminated against her again at a different Jewel-Osco store, located in Crown Point, Indiana. S.F. replied at 8:37 a.m. and requested details, including the store number and the nature of the alleged discrimination, Respondent emailed S.F. at 8:43 a.m. that S.F.'s behavior was "concerning" and, as a result Respondent would report S.F.'s conduct "to the attorney disciplinary commission."

7. On July 28, 2025, beginning at 9:05 a.m. and continuing through 1:49 p.m., Respondent sent five emails to S.F. and other partners in S.F.'s law firm in which she made statements including:

- "as stated, I will file with state and federal civil rights agencies and the attorney disciplinary commission now."
- "[a]s this discriminatory matter is occurring in two states, crossing state lines, it is now a federal matter, and will be reported accordingly. Please advise your client to retain all surveillance video [*sic*] from federal authorities."
- "when the court is looking for the footage [from the Jewel-Osco store], and you have not retained it, that [*sic*] would be because you have been blocking the claims. That's what I'll be reporting to the judge."
- that she would be "sharing [the] information with the attorney disciplinary commission."

8. On July 30, 2025, at 5:45 p.m., S.F. sent an email to Respondent in which she stated that Jewel-Osco had provided S.F. with the specific store that Respondent referenced in her email in paragraph seven, above. At 5:53 p.m., Respondent replied and stated:

"As you are well aware, I am not working with you due to your impropriety.

Your continued communications constitute ongoing harassment and will be reported to law enforcement.

As a consequence, I will be forced to report this matter to state and federal authorities, the media, the ARDC, the DOJ, etc.

You can explain to your client your actions which led to these reports.

All surveillance video must be retained for possible subpoena action.

cc: DOJ, IDHR, ICRC, IAG, ARDC”

9. On September 22, 2025, at 7:05 p.m., Respondent sent an email to S.F. in which she stated:

“The status of these two matters is immediately requested.

You have had the investigation material from Jewel for many months, without offering any resolution, which clearly illustrates wrongdoing on your part.

Your delays represent fraud, obstruction of justice, intimidation, retaliation, and harassment.

A resolution is demanded by 5pm [*sic*] CST 9/24/25.”

10. On September 23, 2025, between 7:44 a.m. and at 8:05 a.m., Respondent and S.F. exchanged emails about Jewel-Osco’s previous settlement offer of a \$200 gift card, which Respondent rejected. Respondent made a \$5,000 counteroffer, which S.F., on behalf of Jewel-Osco, rejected.

11. On September 23, 2025, at 8:10 a.m., Respondent sent an email to S.F. in which she stated that she doubted S.F. shared her settlement offer with Jewel-Osco and that it was “readily apparent that [S.F. was] committing fraud.”

12. On September 26, 2025, at 1:54 p.m., Respondent emailed S.F. and stated:

“I’m sure by now you’ve heard that there’s another matter which has occurred, which has been reported.

This one constitutes a criminal AND civil violation. The police are handling. [emphasis in original]

Criminal charges are being filed immediately.

I will include you in the criminal action[,] [S.F.], for obstruction of justice, fraud, intimidation, complicity, etc.

The attorney licensing board will also be notified regarding these criminal actions.”

13. Respondent’s statements in paragraphs five, six, seven, eight, nine, 11, and 12, above, had no substantial purpose other than to embarrass, delay or burden S.F.

14. Respondent’s statements in paragraphs five, six, seven, eight, nine, and 12, above, constituted threats to present criminal and professional disciplinary charges in order to obtain an advantage in Respondent’s civil claim against Jewel-Osco.

15. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including making the statements described in paragraphs five, six, seven, eight, nine, 11, and 12, above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010); and
- b. presenting, participating in presenting, or threatening to present criminal or professional disciplinary charges to obtain an advantage in a civil matter, by conduct including making the statements in paragraphs five, six, seven, eight, nine, and 12, above, in violation of Rule 8.4(g) of the Illinois Rules of Professional Conduct (2010).

COUNT II

(Using Means That Have No Substantial Purpose Other Than to Embarrass, Delay or Burden Another Person)

16. The Administrator realleges and incorporates paragraphs one through 15, above.

17. At all times alleged in this complaint, Jewel-Osco contracted with Sedgewick, a risk assessment and claim management firm, to process grievances or claims filed with Jewel-Osco.

18. On October 5, 2025, a woman with the initials “L.S.” received a claim file in her capacity as a claims associate at Sedgewick. The file related to Respondent’s claims against Jewel-Osco, described in Count I, above.

19. On October 7, 2025, L.S. called Respondent to discuss Respondent’s claim. During that telephone call, Respondent stated, “Same is going to happen here, same as what happened at United Healthcare.” Respondent’s statement referenced the murder of a United Healthcare Chief Executive Officer in New York City on December 4, 2024.

20. Respondent’s statement in paragraph 19, above, had no substantial purpose other than to embarrass, delay or burden L.S.

21. By reason of the conduct described above, Respondent has engaged in the following misconduct:

- a. using means that have no substantial purpose other than to embarrass, delay, or burden a third person, by conduct including making the statement described in paragraph 19, above, in violation of Rule 4.4(a) of the Illinois Rules of Professional Conduct (2010).

WHEREFORE, the Administrator respectfully requests that this matter be assigned to a panel of the Hearing Board, that a hearing be held, and that the panel make findings of fact, conclusions of fact and law, and a recommendation for such discipline as is warranted.

Respectfully submitted,

Lea S. Gutierrez, Administrator
Attorney Registration and

